

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

FREDERIC Z. HENSLEY and DIANNE R.	)	
HENSLEY,	)	
	)	C/A No. 2:15-CV-2087-ASB
Plaintiffs,	)	
	)	
vs.	)	
	)	
3M COMPANY, et al.,	)	
	)	
Defendants.	)	

**ANSWERS OF DEFENDANT INGERSOLL RAND COMPANY**  
**LOCAL RULE 26.01 INTERROGATORIES**

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER Upon information and belief Medicare may have a subrogation interest in the form of a Medicare lien.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER There is a jury demand in this case.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER (1) Ingersoll Rand Company is an indirect subsidiary of Ingersoll-Rand plc (which is a public company listed on the New York Stock Exchange). This response assumes that we are required to disclose indirect as well as direct ownership. (2) Ingersoll Rand Company is an indirect subsidiary of Ingersoll-Rand plc (which is a public company listed on the New York Stock Exchange). This response assumes that we are required to disclose indirect as well as direct ownership. (3) Ingersoll Rand Company owns 73.99% of the shares of Ingersoll-Rand (India) Limited which is a public company in India. If the court is only interested in companies with securities publicly listed or traded in the U.S., the answer would be

“none.”

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER All or nearly all of the occupational asbestos exposure alleged by Plaintiffs occurred at Charleston Naval Shipyard. Ingersoll Rand Company notes that Plaintiffs chose to venue their state court action in Charleston. Pursuant to 28 U.S.C. 1442(a)(1) (federal officer removal), this action was removed from the Charleston County Court of Common Pleas.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER No.

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER Ingersoll Rand Company does not contend it was improperly identified. Ingersoll Rand Company was also sued as being formerly known as Terry Steam Turbine Company. Ingersoll Rand Company denies that it is Successor in Interest to Terry Steam Turbine Company.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER Discovery may show that the injuries alleged by Plaintiffs were the result of exposure to asbestos from products manufactured by bankrupt entities.

Dated: June 15, 2015.

Respectfully submitted:

EVERT WEATHERSBY HOUFF

/s/ Jennifer M. Techman

Jennifer M. Techman  
SC Fed Bar No. 8028  
Attorneys for Ingersoll Rand Company

3455 Peachtree Road, NE Suite 1550  
Atlanta, GA 30326  
(678) 651-1200 Telephone  
[JMTechman@ewhlaw.com](mailto:JMTechman@ewhlaw.com)

**CERTIFICATE OF SERVICE**

I certify that the foregoing Answers of Ingersoll Rand Company to LR 26.01 Interrogatories was electronically filed in this case and was e-mailed to all counsel of record by filing with the ECF system on June 15, 2015.

**/s/ Jennifer M. Techman**  
Jennifer M. Techman

Evert Weathersby Houff  
3455 Peachtree Road, NE  
Suite 1550  
Atlanta, GA 30326  
(678) 651-1200 Telephone  
(678) 651-1201 Facsimile  
[JMTechman@ewhlaw.com](mailto:JMTechman@ewhlaw.com)